

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

CRUZ-APONTE, et al.

Plaintiffs

v.

CARIBBEAN PETROLEUM CORPORATION,  
et al.

Defendants

Civil No. 09-2092 (FAB)

(Lead Case)

This pleading applies to:

Civil Action Nos. 09-2092, 09-2095, 09-2096, 09-2118, 09-2148, 09-2215, 10-1030, 10-1207, 10-1337, 10-2030, 10-2036, 10-2035, 10-2040, 10-2059, 10-2063, 10-2070, 10-2077, 10-2088, 10-2097, 10-2105, 10-2202, 10-2214, 11-1206

**MOTION FOR VOLUNTARY DISMISSAL WITH PREJUDICE**  
**AGAINST DEFENDANTS ASTRA OIL COMPANY LLC, AOT LIMITED,**  
**AND ASTRA OIL TRADING NV**

**TO THE HONORABLE COURT:**

NOW COME all the plaintiffs in Civil Action Nos. 09-2092, 09-2095, 09-2096, 09-2118, 09-2148, 09-2215, 10-1030, 10-1207, 10-1337, 10-2030, 10-2036, 10-2035, 10-2040, 10-2059, 10-2063, 10-2070, 10-2077, 10-2088, 10-2097, 10-2105, 10-2202, 10-2214, and 11-1206 (collectively "Plaintiffs") and respectfully state and pray as follows:

1. The Plaintiffs have sued Defendants Astra Oil Company LLC, AOT Limited, and Astra Oil Trading NV in the civil actions referenced above.
2. The Plaintiffs, Astra Oil Company LLC, AOT Limited, and Astra Oil Trading NV have entered into a private and confidential settlement, release, and indemnity agreement.
3. In consideration of said agreement, the Plaintiffs hereby voluntarily dismiss with

prejudice the claims asserted against Astra Oil Company LLC, AOT Limited, and Astra Oil Trading NV in the civil actions referenced above.

4. The Plaintiffs will continue prosecuting their respective claims against the rest of the defendants in the civil actions referenced above and reserve all their rights and claims against those other defendants, to the extent that those rights and claims have not yet already been resolved.

**WHEREFORE**, the Plaintiffs respectfully request the Honorable Court to grant this motion and enter Partial Judgment dismissing with prejudice the claims asserted in the civil actions referenced above against Defendants Astra Oil Company LLC, AOT Limited, and Astra Oil Trading NV pursuant to Federal Rule of Civil Procedure 41(a)(2), without the imposition of costs or attorneys' fees, and with full reservation of all rights against all other parties.

**WE HEREBY CERTIFY** that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all attorneys of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 23rd day of October, 2014.

s/ John F. Nevares  
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